

UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF IOWA
CENTRAL DIVISION

Fraserside IP, LLC,)	
)	
Plaintiff,)	
v.)	
)	
Netvertising Ltd, d/b/a HardXXXTube.com,)	Docket No. 11-cv-03034-MWB
WhoIsGuard, d/b/a HardXXXTube.com,)	
Richard Szeles and Laslo Racz, John Does)	
1-100 and John Doe Companies 1-100,)	
Defendants.)	
)	

**DEFENDANTS NETVERTISING LTD, D/B/A HARDXXXTUBE.COM,
RICHARD SZELES, AND LASLO RACZ' MEMORANDUM
OF LAW MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 12(b)(2), defendants Netvertising, Ltd. d/b/a HardXXXTube.com, Richard Szeles, and Laslo Racz (collectively, the "Defendants") respectfully move to dismiss the Plaintiff's complaint in its entirety. In support of this motion, the Defendants state (1) that they are not subject to personal jurisdiction in Iowa, and (2) they are not subject to personal jurisdiction under Fed. R. Civ. P. 4(k)(2). In further support, the Defendants rely on the attached memorandum of law.

Respectfully submitted,
Netvertising Ltd., Richard Szeles, and
Laslo Racz,

By their attorneys,

/s/Evan Fray-Witzer

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ECF CERTIFICATE OF SERVICE

I, Evan Fray-Witzer, hereby certify that on April 16, 2012, a copy of the above document was served on Chad Bellville, attorney for the plaintiff, through the Court's ECF system in accordance with FRCP 5.

/s/ Evan Fray-Witzer